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15 *Attorneys for Plaintiff Nevada Resort Association-*  
16 *International Alliance of Theatrical Stage Employees*  
17 *and Moving Picture Machine Operators of the United*  
18 *States and Canada Local 720 Pension Trust*

19  
20 **UNITED STATES DISTRICT COURT**  
21  
22 **DISTRICT OF NEVADA**

23  
24 NEVADA RESORT ASSOCIATION –  
25 INTERNATIONAL ALLIANCE OF  
26 THEATRICAL STAGE EMPLOYEES  
27 AND MOVING PICTURE MACHINE  
28 OPERATORS OF THE UNITED STATES  
TRUST,  
vs.

Plaintiff,

29  
30 JB VIVA VEGAS, L.P.,

Defendant.

CASE NO.: 2:19-cv-00499-JAD-DJA

31  
32 **STIPULATION AND ORDER TO EXTEND**  
33 **DEADLINE TO FILE MOTIONS FOR**  
34 **SUMMARY JUDGMENT**

35  
36 **[FIRST REQUEST]**

37  
38 JB VIVA VEGAS, L.P.,

Counterclaimant,

39  
40 vs.

41  
42 vs.

1 NEVADA RESORT ASSOCIATION –  
2 INTERNATIONAL ALLIANCE OF  
3 THEATRICAL STAGE EMPLOYEES  
4 AND MOVING PICTURE MACHINE  
OPERATORS OF THE UNITED STATES  
AND CANADA LOCAL 720 PENSION  
TRUST,

5 Counterdefendant.

6  
7 Plaintiff Nevada Resort Association-International Alliance of Theatrical Stage Employees  
8 and Moving Picture Machine Operators of the United States and Canada Local 720 Pension Trust  
9 (the “Trust”) and Defendant JB Viva Vegas, L.P. (“JB”) (collectively “the Parties”) hereby  
10 stipulate and request an order extending the deadline from August 26, 2019, to September 10,  
11 2019, to file the parties’ respective motions for summary judgment.

12 On July 8, 2019, the Parties jointly submitted a proposed scheduling order requesting a  
13 special scheduling review. (ECF No. 15.) In their proposed order, the Parties reported that they  
14 agreed only dispositive motion briefing was required in this case because this matter is a judicial  
15 review of an arbitration award related to a withdrawal liability dispute pursuant to Multiemployer  
16 Pension Plan Amendments Act of 1980, and specifically 29 U.S.C. § 1401(b)(2). (*Id.*)

17 On July 11, 2019, this Court granted the Parties’ proposed scheduling order and scheduled  
18 dispositive motions to be filed by August 26, 2019, with oppositions to be filed by September 16,  
19 2019, and replies to be filed by September 30, 2019. (ECF No. 16.)

20 In the interim, the Trust’s counsel has encountered numerous unexpected professional  
21 obligations that require nearly immediate response. As a result, Trust’s counsel requested an  
22 agreement from JB’s counsel to extend the deadline to file motions for summary judgment until  
23 September 10, 2019. JB’s counsel graciously agreed to the extension in the spirit of professional  
24 courtesy.

25 The parties therefore jointly request that the Court approve the following amended  
26 briefing schedule:

27 1. The Parties shall have until Tuesday, September 10, 2019, to file dispositive  
28 motions.

2. The Parties shall have until Tuesday, October 1, 2019, to file oppositions to dispositive motions.

3. The Parties shall have until Tuesday, October 15, 2019, to file replies in support of dispositive motions.

This request is not being brought for the purpose of delay, but to enable the Parties enough time to properly brief the numerous issues in this matter for this Court.

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

AKIN GUMP STRAUSS HAUER & FELD,  
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*Attorneys for Plaintiffs*

*Attorneys for Defendant*

Dated: August 15, 2019.

Dated: August 15, 2019.

## ORDER

## IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

CASE NO. 2:19-cv-00499-JAD-DJA